

The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
**William A. Hinton State Laboratory Institute**  
305 South Street, Jamaica Plain, MA 02130

DEVAL L. PATRICK  
GOVERNOR

TIMOTHY P. MURRAY  
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD  
SECRETARY

JOHN AUERBACH  
COMMISSIONER

Joseph Roseme, ADA

Suffolk County District Attorney's Office  
By e-mail

February 16, 2012

Re: Comm. v. [REDACTED] State Lab no. [REDACTED]

ADA Roseme,

Please find below the discovery package for the case noted above. The material is collated in the following manner:

- 1) the c.v.'s of the chemists
- 2) the Evidence Office receipt to the Boston Police
- 3) the inventory control card
- 4) the pharmaceutical analysis Sheet
- 5) the pharmacopeia reference, *Micromedex*
- 6) the gas chromatography/mass spectrometry (gc/ms) data

I was the custodial chemist responsible for the chain of custody, weights and the preliminary analysis of the exhibit. Kate Corbett operated the gc/ms for the confirmatory analysis.

If you need further clarification of this material, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler".

Michael Lawler  
Senior Chemist

Cc: Kate Corbett

## Curriculum Vitae

**Michael Lawler**

### Education:

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

### Experience:

**1990-present** currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits (e.g. strychnine in MDMA)

**2005-2008** lecturer in chemistry, Curry College, Milton, Ma.

**1988-1990** New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

**1983-1988** Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

**1982-1983** NENS hypothyroid assay technologist with Tuft's University

**1979-1981** Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

### Additional education and special training

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court

Current Drug Trends – Multijurisdictional Drug Task Force Academy August 2009

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

DEA Special Testing Lab Seminar June 2011

Sigma-Aldrich LC/MS – New Applications Fall 2011

### Journal Publications

**Screening**, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

**Genetic Screening**, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., *To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?*

**The Journal of Pediatrics**, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

### Professional Affiliations

Northeastern Association of Forensic Scientists (NEAFS) since 2005

### Awards

Theobald Smith Education Grant for graduate studies

## Curriculum Vitae

Kate A. Corbett

### Education

Bachelor of Science Degree, CHEMISTRY May 2003

MERRIMACK COLLEGE

Coursework included: Organic Chemistry, Inorganic Chemistry, Quantitative Analysis, Instrumental Analysis, Physical Chemistry, Physics, Calculus

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### Employment

Chemist II State Laboratory Institute (March 2008-Present)

Massachusetts Department of Public Health

Drug Analysis Laboratory

- Responsible for the identification of substance and trafficking substances to determine violation of the Massachusetts drug laws
- Responsible for the identification of pharmaceuticals to determine violation of the Massachusetts drug laws
- Operate analytical instrumentation, microscopes and balances for forensic drug analysis

Chemist I State Laboratory Institute (2005-March 2008)

Massachusetts Department of Public Health

Drug Analysis Laboratory

- Responsible for the identification of substance to determine violation of the Massachusetts drug laws
- Operate analytical instrumentation for the purpose of performing forensic drug analysis
- Successfully completed an eight week training course in the analysis of drugs conducted by senior staff of the Department of Public Health, Drug Analysis Laboratory
- Appointed an assistant analyst for the Department of Public Health, Drug Analysis Laboratory in 2005

Research Associate (September 2003 - August 2005)

SENSOR TECHNOLOGIES, INC. - Shrewsbury, MA

- Prepared chemistries used in making sensor beads
- Generated and examined sensors employing fluorescence spectroscopy
- Performed protein, dye and sugar assays using UV/VIS spectrophotometry
- Carried out titrations on ricin using fluorescence correlation spectroscopy
- Statistical analysis of experimental data

Intern (March 2003 - August 2003)

MASSACHUSETTS STATE POLICE CRIME LABORATORY - Sudbury, MA

- Assisted in the gathering of case files to fulfill the National Institute of Justice's No Suspect Backlog Reduction Grant
- Observed in the Evidence, Criminalistics, DNA, Drug, Trace, Toxicology, and Bomb/Arson Units

**DRUG RECEIPT**

CC #

BOOK # 156PAGE # 181

DESTRUCTION # \_\_\_\_\_

District/Unit B1010Name & Rank of Arresting Officer PO Brendan Lyons / Michael Condon ID# 82917 / 93431

DEFENDANT'S NAME

ADDRESS

CITY

STATE

DESCRIPTION OF ITEMS SUBMITTED

GROSS  
QUANTITYGROSS  
WEIGHT

LAB USE ONLY

ANALYSIS  
NUMBER1 pill bottle of clonazepam49 pills22.89g**To be completed by ECU personnel only**

Name and Rank of Submitting Officer

ID#

Received by

Date

ECU Control #

No. [REDACTED]  
City: Boston D.C.U. Police Dept.  
Officer: P.O. Diana Lopez  
Def: [REDACTED]

Date Analyzed: 1/12/12

Amount: 49.0  
No. Cont: 1 Cont: pc  
Date Rec'd: 11/14/2011  
Gross Wt.: 22.89 ✓

Subst: TAB

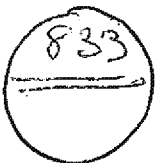

No. Analyzed: 2  
Net Weight: 8.14g  
# Tests: 1

2 Inj tabs to test  
Prelim: clonazepam

Findings: Clonazepam

Pharmaceutical Analysis Sheet

(2-7)  
11

Sample [redacted] City Boston E.O. weight 22.89g  
Count 49 tablet Description: Rx bottle  
Ballistic I.D. clonazepam 1mg   net wt = 8.1422g  
I.D. Source Micromedex green  
Final I.D. clonazepam MS chemist KAC completed 1/12/12

# Drug Information

**DRUG NAME:** CLONAZEPAM

**INGREDIENTS:** CLONAZEPAM -- 1 MG

**Color:** Green

**Shape:** Circle

**Imprint:** 833 This tablet is debossed with 833 above the scored line and TEVA on the unscored side, TEVA

**Form:** Oral Tablet

**Available-Container-Size:** Bottle of 100, Bottle of 1000, Bottle of 500

**AAPCC Code:** 007000 - Benzodiazepines

**NDC:** 00093-0833-93

00093-0833-10

00093-0833-05

00093-0833-01

**Excipients:** Lactose (Monohydrate); Magnesium Stearate; Cellulose, Microcrystalline; Povidone; Water, Purified; Starch, Corn; D&C Yellow No. 10 Aluminum Lake; FD&C Blue No. 1 Aluminum Lake

**Regulatory Status:** Schedule IV

**Availability:** United States

**Product ID** 7150694

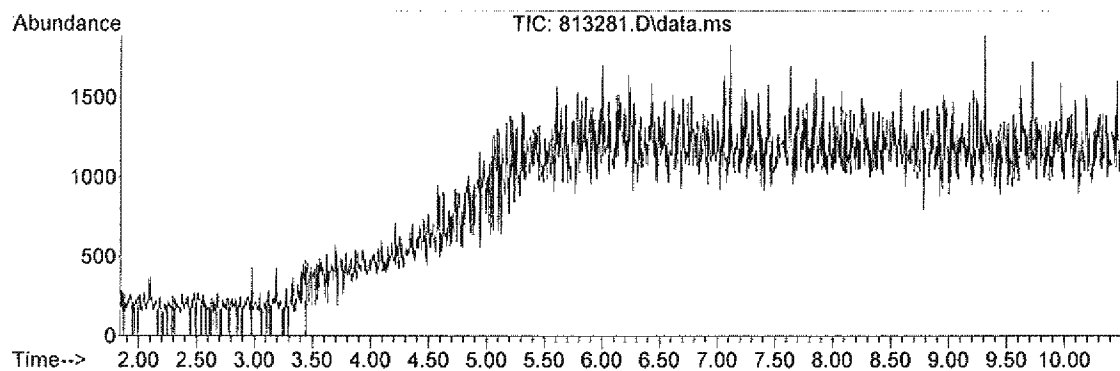
**Contact:** Teva Pharmaceuticals

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✓KAC  
2/15/12

## Information from Data File:

File Name : J:\01\_11\_12\813281.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 6:53  
Sample Name : BLANK  
Submitted by :  
Vial Number : 2  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

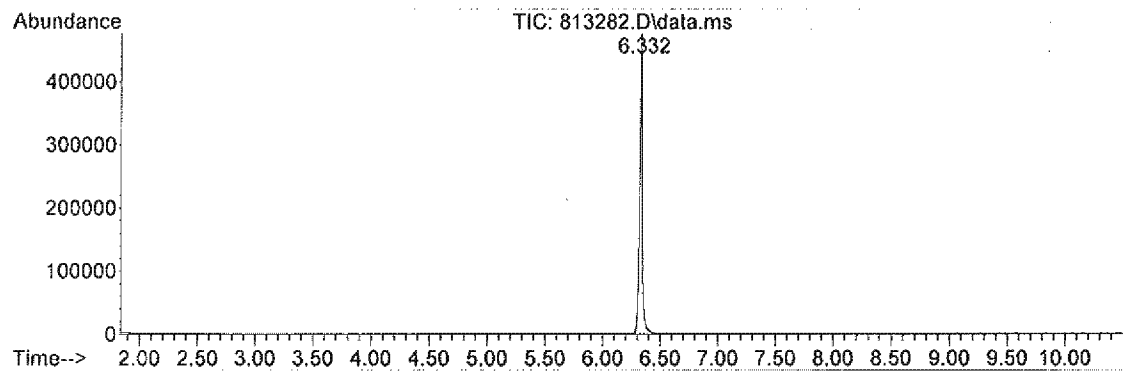


Ret. Time	Area	Area %	Ratio %
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\*\*\*NO INTEGRATED PEAKS\*\*\*

## Information from Data File:

File Name : J:\01\_11\_12\813282.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 7:06  
Sample Name : CLONAZEPAM STD  
Submitted by :  
Vial Number : 82  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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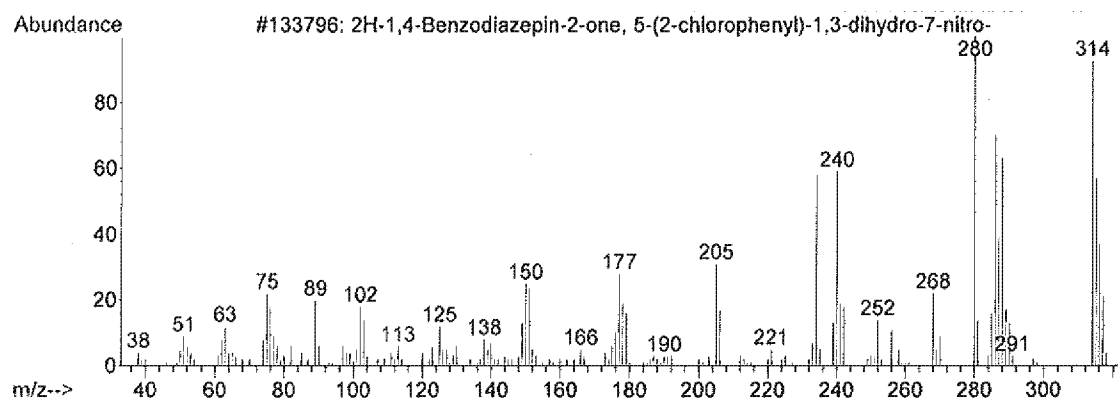
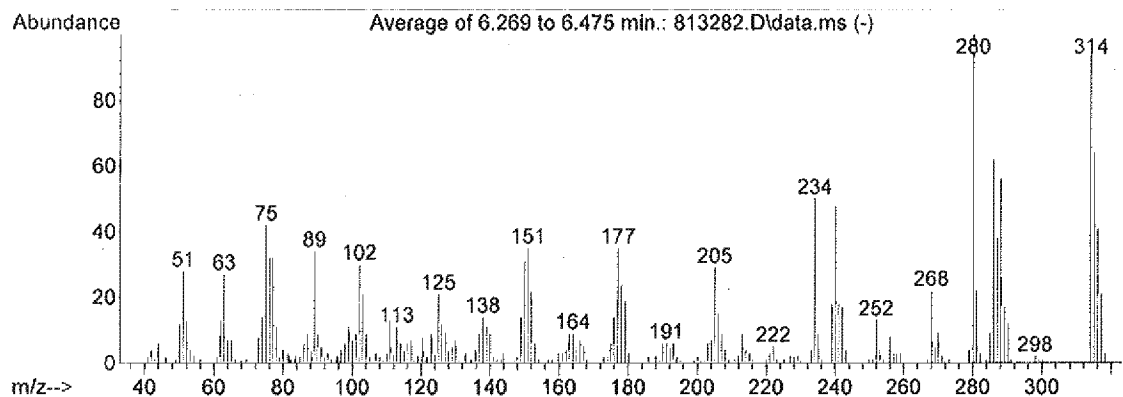
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## Information from Data File:

File Name : J:\01\_11\_12\813282.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 7:06  
Sample Name : CLONAZEPAM STD  
Submitted by :  
Vial Number : 82  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

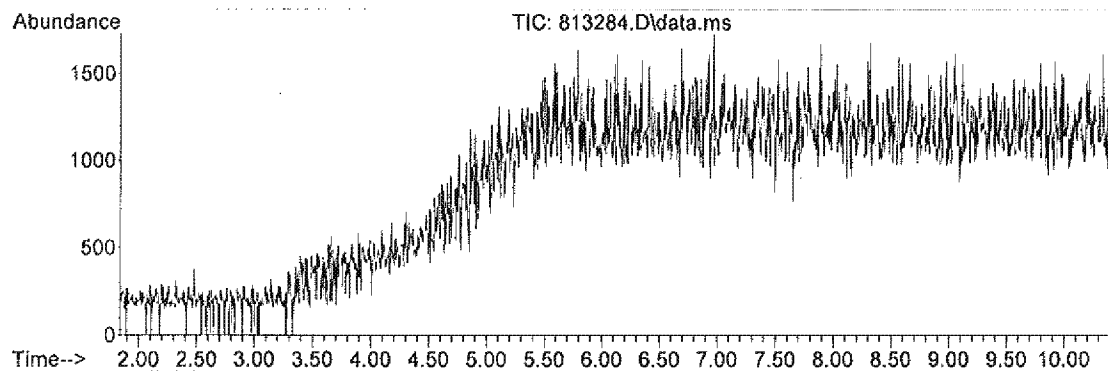
Search Libraries: C:\Database\SLI.L Minimum Quality: 80  
C:\Database\NIST05a.L Minimum Quality: 80  
C:\Database\PMW\_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	92



## Information from Data File:

File Name : J:\01\_11\_12\813284.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 7:32  
Sample Name : BLANK  
Submitted by : MGL  
Vial Number : 2  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

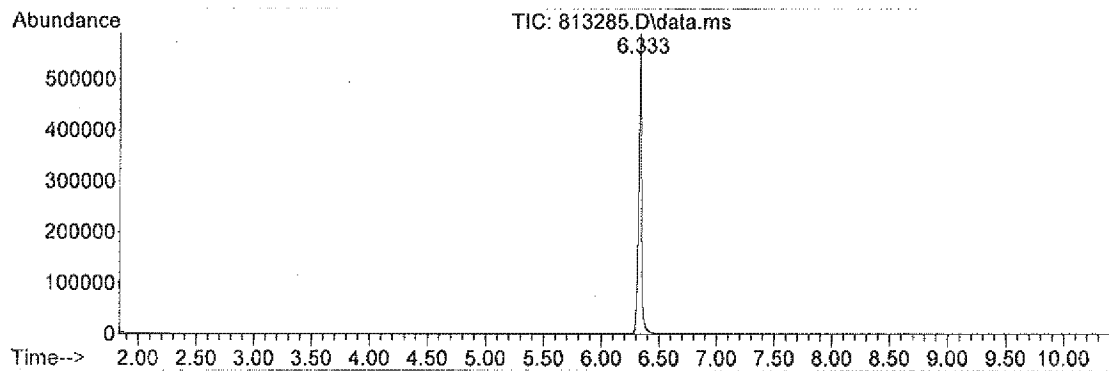


Ret. Time	Area	Area %	Ratio %
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\*\*\*NO INTEGRATED PEAKS\*\*\*

## Information from Data File:

File Name : J:\01\_11\_12\813285.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 7:45  
Sample Name : XXXXXXXXXX  
Submitted by : MGL  
Vial Number : 85  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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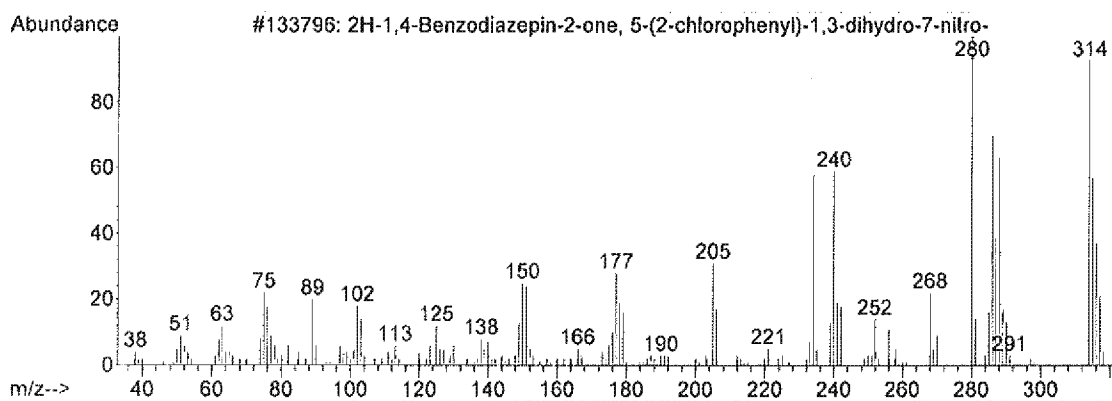
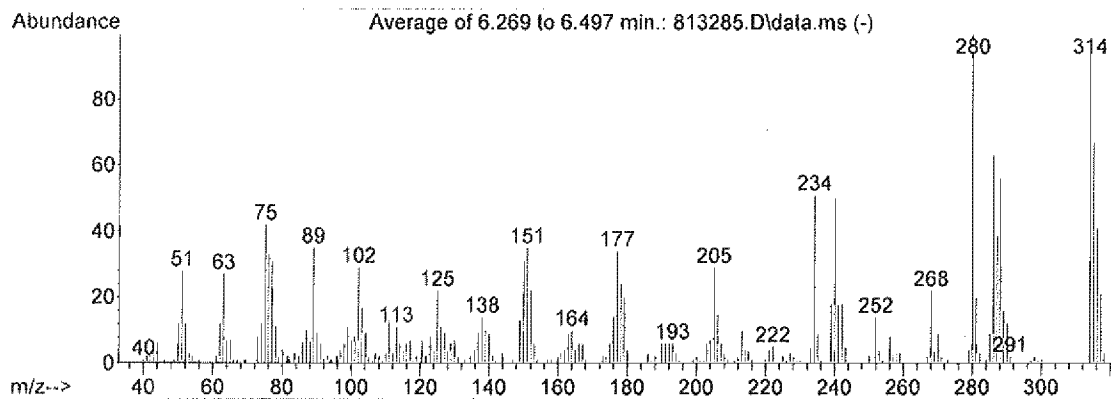
6.333	1008612	100.00	100.00
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## Information from Data File:

File Name : J:\01\_11\_12\813285.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 7:45  
Sample Name : XXXXXXXXXX  
Submitted by : MGL  
Vial Number : 85  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

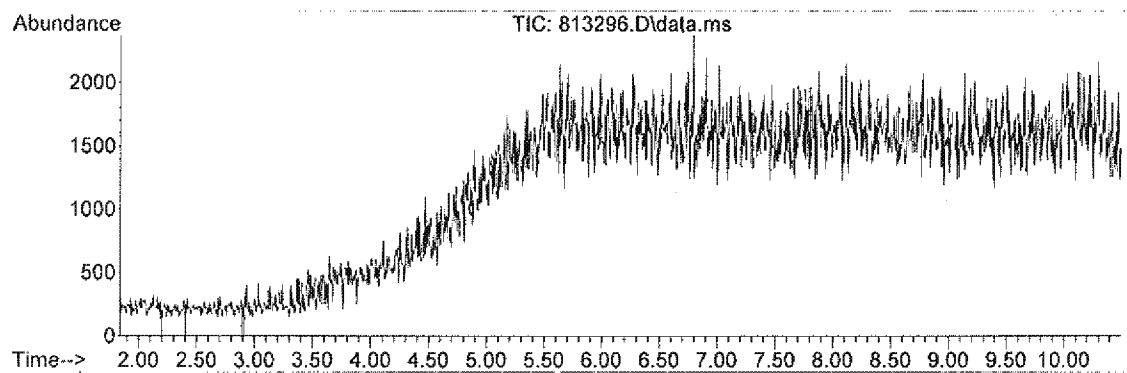
Search Libraries: C:\Database\SLI.L Minimum Quality: 80  
C:\Database\NIST05a.L Minimum Quality: 80  
C:\Database\PMW\_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	92



## Information from Data File:

File Name : J:\01\_11\_12\813296.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 10:09  
Sample Name : BLANK  
Submitted by :  
Vial Number : 2  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

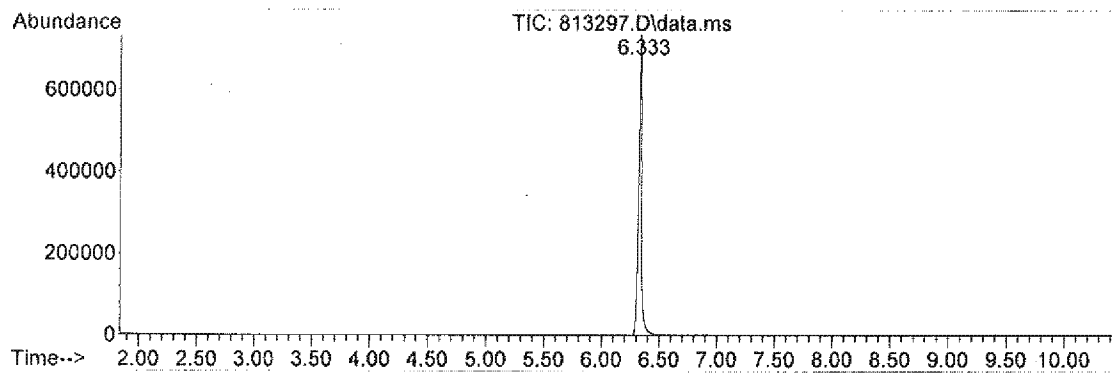


Ret. Time	Area	Area %	Ratio %
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\*\*\*NO INTEGRATED PEAKS\*\*\*

## Information from Data File:

File Name : J:\01\_11\_12\813297.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 10:22  
Sample Name : CLONAZEPAM STD  
Submitted by :  
Vial Number : 82  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE



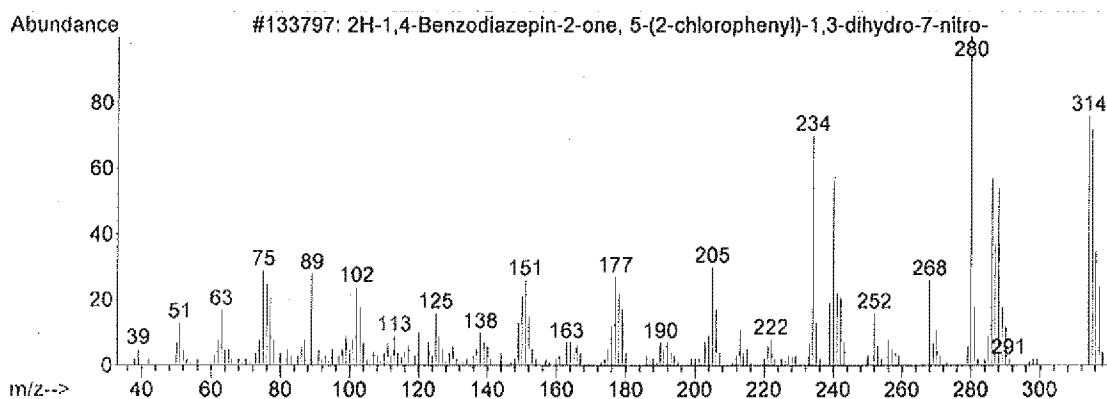
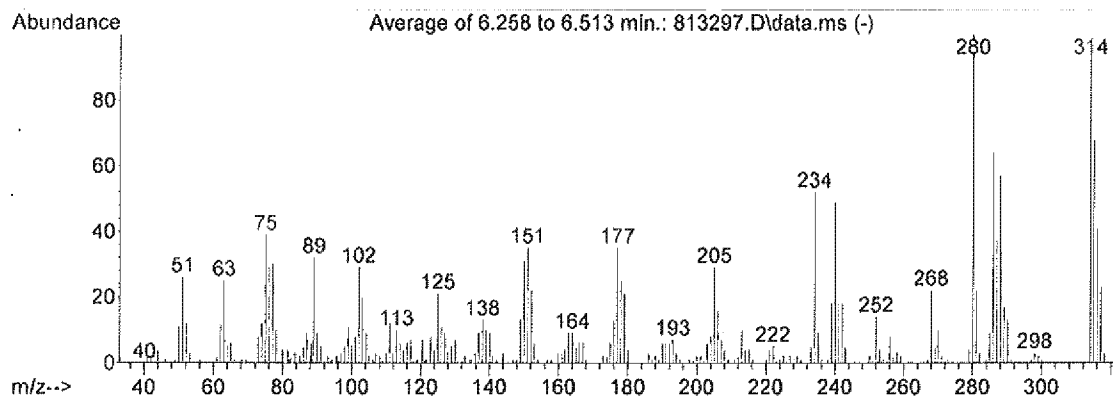
Ret. Time	Area	Area %	Ratio %
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## Information from Data File:

File Name : J:\01\_11\_12\813297.D  
Operator : KAC  
Date Acquired : 12 Jan 2012 10:22  
Sample Name : CLONAZEPAM STD  
Submitted by :  
Vial Number : 82  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80  
C:\Database\NIST05a.L Minimum Quality: 80  
C:\Database\PMW\_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99



***Last page.....no further data***